

**J. DOUGLAS WILSON (DCBN 412811)**  
Chief, Criminal Division

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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

RONNIE ADAMS,  
TAMMY ADAMS,  
RED HAWK,  
CANDY MILLER,  
MOSES HAWK,  
TOBY GEORGE,  
ALEX MILLER,  
DANIELLE MILLER, and  
ALEX SOSENSKY.

Defendants.

NO. CR 13-MJ-71441 MAG

## STIPULATION AND ~~PROPOSED~~ ORDER CHANGING HEARING DATE

The Court has set January 28, 2014, at 9:30 a.m. as the date for a preliminary hearing or arraignment. The parties hereby stipulate to set the preliminary hearing or arraignment date on March 25, 2014, and they request that the Court extend the time limits provided by Federal Rule of Criminal Procedure 5.1(c). This extension of time is necessary for the parties to explore possible pre-indictment

STIPULATION AND [PROPOSED] ORDER CHANGING HEARING DATE  
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resolution, to produce and review discovery, and for effective preparation of counsel.

Pursuant to Rule 5.1(d), the defendants and the government consent to the extension of time, and the parties represent that good cause exists for this extension, including the effective preparation of counsel. See 18 U.S.C. § 3161(h)(7)(B)(iv). For the same reasons, the parties also request that the Court exclude from the time limits of 18 U.S.C. § 3161 the period from the date of this Order through March 25, 2014. The parties also agree that the ends of justice served by granting such an exclusion of time outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

SO STIPULATED:

MELINDA HAAG

United States Attorney

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
KEVIN J. BARRY  
Assistant United States Attorney

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
MICHAEL STEPANIAN  
Attorney for RONNIE ADAMS

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
WINSTON Y. CHAN  
Attorney for TAMMY ADAMS

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
RICHARD TAMOR  
Attorney for RED HAWK

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
MARY MCNAMARA  
Attorney for CANDY MILLER

DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
MARK VERMEULEN  
Attorney for MOSES HAWK

1 DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
ERIK BABCOCK  
Attorney for TOBY GEORGE

4 DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
BRIAN BERSON  
Attorney for DANIELLE MILLER

7 DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
JONATHAN FRIED  
Attorney for ALEX SOSENSKY

11 Attestation of Filer

12 In addition to myself, the other signatories to this document are the attorneys listed above. I attest  
13 that I have their permission to enter a conformed signature on their behalf and to file the document.  
14

15 DATED: January 27, 2014

\_\_\_\_\_/s/\_\_\_\_\_  
KEVIN J. BARRY  
Assistant United States Attorney

21 ~~PROPOSED~~ ORDER

22 For the reasons stated above, the Court sets March 25, 2014, as the date for the arraignment or  
23 preliminary hearing. The Court finds that extension of time limits applicable under Federal Rule of  
24 Criminal Procedure 5.1(c) from the date of this Order through March 25, 2014, is warranted; that  
25 exclusion of this period from the time limits applicable under 18 U.S.C. § 3161 is warranted; that the ends  
26 of justice served by the continuance outweigh the interests of the public and the defendant in the prompt  
27 disposition of this criminal case; and that the failure to grant the requested exclusion of time would deny  
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counsel for the defendant and for the government the reasonable time necessary for effective preparation of counsel, taking into account the exercise of due diligence, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 1/28/14

  
HON. ELIZABETH D. LAPORTE  
United States Magistrate Judge